

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA, EASTERN DIVISION**

**CANDACE ALEXANDER,**

Plaintiff,

v.

**JAMEKA SCALES, COREY BENNETT, PATRICK BENNETT, and VICKIE BENNETT,**

Defendants.

**Civil Action No.: 1:25-cv-980-clm**

**EXHIBIT S**

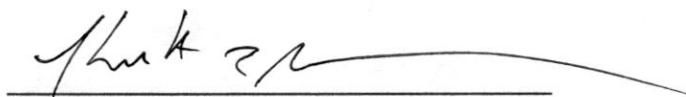
**Declaration of Spousal Privilege and Refusal to Testify**

**I, Keith Alexander,** hereby declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the legal spouse of **Plaintiff Candace Alexander**, having been lawfully married since **October 9, 2008**.
2. I have reviewed the pleadings in the above-captioned case and am aware that the Defendants may seek to compel my testimony regarding matters of communication, strategy, and household context shared between myself and my wife.
3. Pursuant to **Federal Rule of Evidence 501**, and under the common law principles of **spousal testimonial privilege**, I hereby assert my **right to refuse to testify against my spouse** in any matter concerning private communications, strategic conversations, or emotional decisions made during the course of events underlying this litigation.
4. I further invoke the **marital communications privilege**, which protects **all confidential communications** made between spouses during a valid marriage. This includes but is not limited to:
  - o Verbal discussions related to the harassment campaign described in Plaintiff's Complaint;
  - o Emails, chats, texts, or planning documents shared privately between Plaintiff and myself;
  - o Legal strategy, emotional reactions, or decisions related to third-party interactions.
5. I am not a party to this case and I do not waive these privileges under any circumstance. I affirm that I have **no financial interest in the outcome** of this case beyond my status as a supportive spouse and witness to relevant events.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of July, 2025

Location: Owens Cross Roads, Alabama

A handwritten signature in black ink, appearing to read "Keith Alexander", is written over a horizontal line.

**Keith Alexander**

Declarant